

1 THE HONORABLE ROBERT S. LASNIK
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 SANDRA K. LONG, a single individual,
11 Plaintiff,

12 v.

13 USAA CASUALTY INSURANCE
14 COMPANY, DOES I-X,

Defendants.

No. 2:19-cv-00568 RSL

**STIPULATION TO AMEND NOTING
DATE OF DEFENDANT'S MOTION
FOR SUMMARY JUDGMENT**

15 **COMES NOW** Plaintiff Sandra K. Long (“Plaintiff”) and Defendant USAA
16 Casualty Insurance Company (“Defendant”) (collectively the “Parties”), by and through
17 their undersigned counsel of record, and hereby stipulate to amend the noting date of
18 Defendant’s Motion for Summary Judgment (the “Motion”) by one week from October 2,
19 2020 to October 9, 2020 thereby causing Plaintiff’s Response to the Motion be extended
20 one-week to Monday, October 5, 2020.

21 Attorney Daniel McLafferty and his wife recently had a baby born a couple of
22 weeks early. Attorney McLafferty was primarily responsible for preparing Plaintiff’s
23 Response to the Motion, and is now on paternity leave. Attorney Michael N. Poli is now
24 responsible for preparing the Response but had deadlines in other cases preventing him
25 from devoting the necessary time to prepare the Response.

STIPULATION FOR EXTENSION OF TIME
FOR PLAINTIFF TO RESPOND TO DEFENDANT’S
MOTION FOR SUMMARY JUDGMENT

ROBERT D. BOHM, P.L.L.C.
POLI, MOON && ZANE, PLLC

1 Therefore, for the foregoing reasons, the Parties hereby stipulate and agree to
2 extend the noting date of Defendant's Motion for Summary Judgment to October 9, 2020,
3 thereby extending the deadlines for Plaintiff's Response to Defendant's Motion for
4 Summary Judgment to October 5, 2020 and Defendant's Reply in Support of its Motion
5 for Summary Judgment to October 9, 2020.

6 DATED this 28th day of September, 2020.

7 CORR CRONIN LLP

ROBERT D. BOHM, PLLC

8 */s/ Victoria E. Ainsworth (w/permission)*
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17 STIPULATION FOR EXTENSION OF TIME
18 FOR PLAINTIFF TO RESPOND TO DEFENDANT'S
19 MOTION FOR SUMMARY JUDGMENT

20 ROBERT D. BOHM, P.L.L.C.
21 POLI, MOON && ZANE, PLLC

II. ORDER

IT IS SO ORDERED that, for good cause shown, Defendant USAA CIC's motion for summary judgment is hereby re-noted for consideration on October 9, 2020. Pursuant to LCR 7(d)(3), Plaintiff's response to USAA CIC's motion for summary judgment is due October 5, 2020. USAA CIC's reply is due on October 9, 2020.

This continuance shall not affect any other deadlines. Pursuant to the Court's May 6, 2020 minute order, the parties shall file a joint status report within the later of 21 days of the Court's resolution of the pending summary judgment motion or the reopening of the Seattle Courthouse.

DATED: September 29, 2020.

Mrs Casnik

HONORABLE ROBERT S. LASNIK
United States District Court Judge

Presented by:

CORR CRONIN LLP

s/ Victoria E. Ainsworth

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**STIPULATION FOR EXTENSION OF TIME
FOR PLAINTIFF TO RESPOND TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

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